## LAW OFFICES BLOOSTON, MORDKOFSKY, DICKENS, DUFFY & PRENDERGAST, LLP

2120 L STREET, NW WASHINGTON, DC 20037

(202) 659-0830 FACSIMILE: (202) 828-5568 AFFILIATED SOUTH AMERICAN OFFICES
ESTUDIO JAUREGUI & ASSOCIATES
BUENOS AIRES, ARGENTINA

HAROLD MORDKOFSKY
OF COUNSEL

**EUGENE MALISZEWSKYJ** ENGINEERING CONSULTANT

ARTHUR BLOOSTON 1914 – 1999

BENJAMIN H. DICKENS, JR.

SALVATORE TAILLEFER, JR.

JOHN A. PRENDERGAST

**GERARD J. DUFFY** 

RICHARD D. RUBINO MARY J. SISAK

D. CARY MITCHELL

July 31, 2018

1914 – 1999

Writer's Contact Information (202) 828-5538 cary@bloostonlaw.com

Via ECFS

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW, Room TW-A325 Washington, DC 20554

Re:

Second Progress Report E911 Location Accuracy, PS Docket No. 07-114

Dear Ms. Dortch:

Pursuant to Section 20.18(i)(4)(ii) of the Commission's Rules, Manti Tele Communications Company, Inc. ("Manti") hereby submits its second progress report on implementation of indoor location accuracy improvements.

Please contact the undersigned counsel should you have any questions.

Very truly yours,

D. Cary Mitchell Its Counsel

## Manti Tele Communications Company

E911 Location Accuracy Progress Report 47 C.F.R. § 20.18(i)(4)(ii) PS Docket No. 07-114

## Second Progress Report

Manti Tele Communications Company ("Manti" or "the Company") is a Tier III CMRS service provider in rural Utah that is a close affiliate of Manti Telephone Company, a family-owned local exchange carrier in Manti, Utah. Manti participates in a switch sharing arrangement operated in Roosevelt, Utah, by Rural Independent Network Alliance, LLC ("RINA"), and it provides service to end user customers under the name Breakaway Wireless.

Manti provides CMRS service in Sanpete County, Utah. As of the date of this Second Progress Report, no authorities responsible for emergency call response in Manti's service area have requested that the Company provide Phase II Enhanced 911 ("E911") service. As a result, Manti has neither procured nor installed the equipment and services necessary to generate Phase II Automatic Location Information ("ALI") or indoor location data, and we have filed with the FCC a request for temporary waiver of the Commission's indoor accuracy provisions and related reporting requirements.<sup>1</sup>

Without prejudice to its pending waiver request, Manti provides this Second Report to demonstrate the Company's awareness of and commitment to meeting the Commission's wireless E911 indoor location accuracy requirements once a PSAP or appropriate local emergency authority in the Company's service area is capable of utilizing such data and submits a formal request.

Please direct any questions concerning this report to our counsel, Mr. Cary Mitchell, of the law firm of Blooston Mordkofsky Dickens Duffy & Prendergast, LLP. He can be reached by telephone at (202) 828-5538, or by email at <a href="mailto:cary@bloostonlaw.com">cary@bloostonlaw.com</a>.

Dated 31, 1019

Dallas Cox

Manti Tele Communications Company, Inc. 40 West Union Manti, UT 84642

See Petition for Temporary Waiver of Manti Tele Communications Company, Inc., PS Docket No. 07-114, filed May 27, 2017 ("Petition for Waiver").